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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION**

O.S. SECURITY LLC,

Plaintiff,

vs.

SCHLAGE LOCK
COMPANY LLC,

Defendant.

Case No. SACV14-00319 AG (DFMx)

Honorable Andrew J. Guilford

**NOTICE OF MOTION AND
MOTION TO REMOVE
INCORRECTLY FILED
DOCUMENTS**

**SCHLAGE'S NOTICE OF MOTION AND MOTION TO REMOVE
INCORRECTLY FILED DOCUMENTS**

1 TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF
2 RECORD:

3 PLEASE TAKE NOTICE that Defendant Schlage Lock Company LLC
4 submits this Motion to Remove Incorrectly Filed Documents Exhibits B, C, H, I, J,
5 K, L, N, O, P, Q, R, and S to Declaration of Jeffrey TG Kelsey In Support of
6 Schlage's Motion for Partial Summary Judgment, Docket No. 132. Pursuant to
7 Local Rule 79-5 (b), when electronically filed, counsel inadvertently included
8 Exhibits B, C, H, I, J, K, L, N, O, P, Q, R, and S in the public version of the filed
9 copy of the declaration. The content of these exhibits should have been lodged
10 under seal. *See* Declaration of Jeffrey TG Kelsey In Support of Defendant's
11 Motion to Remove Incorrectly Filed Documents; Docket No. 132, ¶3.

12 After discovering the error, counsel contacted the ECF Help Desk and
13 requested that a temporary lock be placed on the documents. ¶4. These documents
14 include confidential business information of Plaintiff O.S. Security, Defendant
15 Schlage Lock, and other third parties that has not been redacted. ¶5.

16 Accordingly, Defendant Schlage Lock Company respectfully requests that
17 the following Docket Nos. be permanently deleted from the docket:

18 Docket Number 132-5;
19 Docket Number 132-6;
20 Docket Number 132-11;
21 Docket Number 132-12;
22 Docket Number 132-13;
23 Docket Number 132-14;
24 Docket Number 132-15;
25 Docket Number 132-16;
26 Docket Number 132-18;
27 Docket Number 132-19;
28 Docket Number 132-20;

1 Docket Number 132-21;
2 Docket Number 132-22; and
3 Docket Number 132-23.

4 Good cause exists to grant this motion, which will not prejudice the Plaintiff.
5 Schlage has served copies of each of these exhibits on the Plaintiff in accordance
6 with this Court's rules, and the Plaintiff will have the benefit of each of these
7 documents in preparing any response to Schlage's motion for partial summary
8 judgment. In addition, Schlage is submitting courtesy copies of each of the
9 exhibits to the Court and is proceeding to ensure that replacement copies are
10 properly filed, under seal, in accordance with this Court's Orders and rules.

11 Schlage respectfully requests that this motion be granted.

12
13 Dated: August 18, 2015

BARNES & THORNBURG LLP

14 By: /s/Jeffrey TG Kelsey

15 **Attorneys for Defendant**
16 **SCHLAGE LOCK COMPANY LLC**

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CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2015, the foregoing document was filed electronically via the Court's Electronic Case Filing System (ECF). Notice of the filing is being served upon all counsel of record automatically through Notice of Electronic Filing.

/s/ Jeffrey TG Kelsey
Jeffrey TG Kelsey